

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

SVETLANA LOKHOVA,

Plaintiff,

v.

STEFAN A. HALPER,

Defendant.

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) No: 1:20-cv-01603-LMB-WEF
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CONSENT MOTION TO CONTINUE INITIAL PRETRIAL CONFERENCE

COMES NOW, the Plaintiff, by and through undersigned counsel, and moves this Honorable Court to continue the upcoming Initial Pretrial Conference, and for good cause in support thereof states as follows:

1. On July 15, 2022, the Court issued a Scheduling Order in this matter setting an Initial Pretrial Conference for the case on Wednesday, August 10, 2022 at 11:00 am.
2. Plaintiff's Counsel has a scheduling conflict on that date as she is solo/lead counsel in a criminal case in the United States District Court for the District of Maryland (Greenbelt), case number 19-cr-0443-PX-2, which is set for a five-day jury trial from Monday, August 8, 2022 to Friday, August 12, 2022, inclusive. See attached email.

3. There is some possibility that that case will also carry over into the next week, particularly for jury deliberations.
4. Counsel for the Defendant has authorized undersigned counsel to state that he consents to a continuance of the Initial Pretrial Conference in this matter.
5. The parties have consulted as to mutually convenient dates.
6. The parties also agree to waive a hearing on this motion.

WHEREFORE, it is respectfully requested that the Court re-set the Initial PreTrial Conference to Friday, August 19, 2022 at 11:00 am, or such other date as is convenient for the Court after August 16, 2022.

Dated: July 22, 2022

Respectfully Submitted,

_____/s/_____
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that, on July 22, 2022, I electronically filed the foregoing Notice of Plaintiff's Intention to File an Amended Complaint, using the CM/ECF system, which will send a notification of such filing (NEF) to all properly designated parties and counsel.

_____/s/_____
Leslie McAdoo Gordon